

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAMUEL I. HYLAND,
individually and on behalf of all
others similarly situated,

Plaintiff,
v.

J.P. MORGAN SECURITIES, INC.,
a Delaware corporation,

Defendant.

Civil Action No. 06-224 JJF

CLASS ACTION

**PLAINTIFF SAMUEL I. HYLAND'S MOTION TO
MODIFY THE PSLRA'S STAY OF DISCOVERY**

Plaintiff Samuel I. Hyland ("Plaintiff") respectfully requests that this Court issue an Order directing defendant J.P. Morgan Securities, Inc. to produce to Plaintiff all documents that have been and will be produced to plaintiff in *Blau v. Harrison*, No. 04-6592 (N.D. Ill.). In accordance with Local Rule 7.1.1, Plaintiff sought the concurrence of counsel to defendant in the relief requested by this motion, but defendant's counsel refused to make available the subject document production. In support of this motion, Plaintiff incorporates herein by reference the opening brief filed herewith.

DATED: June 22, 2006

Respectfully submitted,

/s/ *Joseph N. Gielata*
JOSEPH N. GIELATA (# 4338)
Attorney at Law
501 Silverside Road, No. 90
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(302) 798-1096

Attorney for Plaintiff Samuel Hyland

CERTIFICATE OF SERVICE

I hereby certify that, on June 22, 2006, I electronically filed *PLAINTIFF SAMUEL I. HYLAND'S MOTION TO MODIFY THE PSLRA'S STAY OF DISCOVERY* with the Clerk of Court using CM/ECF which will send notification of such filing to:

Michael R. Robinson, Esq.
RICHARDS LAYTON & FINGER, P.A.
One Rodney Square
Wilmington, DE 19801

Counsel for Defendant

/s/ Joseph N. Gielata

Joseph N. Gielata (# 4338)

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[PROPOSED] ORDER

Having considered Plaintiff Samuel I. Hyland's Motion To Modify The PSLRA's Stay Of Discovery, and for good cause shown, defendant J.P. Morgan Securities, Inc. and its parent company JPMorgan Chase & Co. are hereby directed to produce to Plaintiff copies of all documents and any other discovery produced to the plaintiff in *Blau v. Harrison*, 04-6592, presently pending in the Northern District of Illinois. IT IS SO ORDERED.

DATED: _____, 2006

UNITED STATES DISTRICT JUDGE
HONORABLE JOSEPH J. FARNAN, JR.